



## ADVOCATES

FOR HIGHWAY  
AND AUTO SAFETY

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Docket No. FMCSA-2003-16324  
U.S. DOT Dockets, Room PL-401  
U.S. Department of Transportation  
400 Seventh Street, S.W.  
Washington, D.C. 20590

**Share the Road Safety Campaign Assessment, Notice and  
Request for Comments, 68 FR 68446 *et seq.*, December 8, 2003**

Advocates for Highway and Auto Safety (Advocates) provides the following comments in response to the request by the Federal Motor Carrier Safety Administration (FMCSA) for public comments on its proposed sample of 1,000 household interviews “to help the FMCSA establish a baseline for determining the public’s awareness of large commercial motor vehicle limitations.” 68 FR 68446. The FMCSA states its intention to collect the same information again after another two to three years to “assess improvements in public awareness as a result of STRS [Share the Road Safely] public outreach efforts.” *Id.*

Advocates strongly opposes this proposed information collection action as a patent waste of federal funds that could be put to far better use. As Advocates stressed in comments filed with the FMCSA’s predecessor agency, the Federal Highway Administration (FHWA), on April 29, 1999,<sup>1</sup> the use of a questionnaire purportedly to elicit responses by interviewees about their “awareness” of the STRS campaign and/or of the “limitations” of commercial motor vehicles when on the road is simply pseudo-science masquerading as hard data collection. The only meaningful empirical measure for the value of the STRS effort is the actual extent to which crash reduction in numbers or severity has occurred as a product of the federal funds spent on this campaign over the last several years. The FHWA’s No-Zone campaign, the previous name used to characterize the STRS campaign, was severely criticized in 1999 by the United States General Accounting Office that it had chronically failed to demonstrate achievement of its own asserted goals of reducing fatal crashes between large truck and passenger

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<sup>1</sup> Incorporated here in their entirety by reference and copy separately submitted to the current Docket FMCSA-2003-16324 for inclusion in the administrative record of this action.

vehicles, and that the effort had no genuine quantitative measures of effectiveness.<sup>2</sup> Despite this valid criticism, the FMCSA has continued to disregard the call for hard data on crash reduction to justify continued expenditures and instead offers a “quantitative analysis” of the STRS through a survey of passenger vehicle driver attitudes and awareness.<sup>3</sup> A survey of driver awareness of the STRS is not a measure of program effectiveness.

Moreover, the STRS campaign, in companionship with the trucking industry’s No Zone demonstrations, continues to be used as the primary source of unsubstantiated allegations that the preponderant majority of truck-passenger vehicle crashes are either “caused by” or are the “fault” of the passenger vehicle drivers. Both the FHWA and the FMCSA have fostered this accusation in the past, and it continues to have currency despite retractions about fault by the agencies and the truck industry in recent years. In addition, the claim that most truck-passenger vehicle crashes are “caused” by passenger vehicle drivers has gained new life on the basis of preliminary data from the Large Truck Crash Causation Study (LTCCS) released by the FMCSA showing that actions by passenger vehicle operators are the major source of truck-passenger vehicle crashes. As Advocates has argued in greater detail in other fora, we regard the data of the LTCCS to be essentially worthless because of fundamental violations of well-known data collection protocols. We also regard the research design of the LTCCS to be highly defective, as was shown in repeated letters sent to FMSCA and National Highway Traffic Safety Administration (NHTSA) officials by the oversight committee empaneled at the Transportation Research Board of the National Academy of Sciences under the chairmanship of Forrest Council, and to be inherently incapable of providing scientific causal explanations for any of the events studied.

The FHWA ignored Advocates’ comments of record on the bankrupt character of the No-Zone campaign that were filed with Docket FHWA-99-5110 (64 FR 10060 *et seq.*, March 1, 1999) that included our opposition to spending any more federal funds on either the campaign or the agency’s worthless efforts to use pseudo-quantitative approaches to measuring the impact of the campaign. It is clear that these comments were simply disregarded by the agency. The FMCSA has an opportunity to respond to these new comments being supplied to the current docket and to attempt to rebut the charge that the STRS campaign and its surveys to show its effect on motorist “awareness” are misuses of federal funds. The FMCSA also needs to address the continuing charge that the agency is using the STRS to abet accusations that passenger vehicle drivers are the main source of truck-passenger vehicle crashes.

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<sup>2</sup> GAO/T-RCED-99-122, March 17, 1999.

<sup>3</sup> There should be no need here to detail for the agency the rich literature on survey instrument construction and implementation that repeatedly stresses the extent to which certain survey issues and questions elicit responses that are strongly prejudiced by respondents’ inclination to affirm positive attitudes and awareness of public safety and health issues.

The STRS public relations and educational efforts have failed because the FMCSA has constantly associated the campaign's message with efforts to assign blame rather than promote an even-handed educational effort to affect motorists' and heavy truck drivers' safety practices. Also, we emphasize again that the campaign has continuously refused to actually document any crash reduction benefits from the use of federal funds.

As the result of the use of defective research studies, including those produced in the past few years by the University of Michigan Transportation Research Institute and the ongoing LTCCS, to demonstrate crash causation and, inevitably, to assign blame, the FMCSA has alienated much of the highway and traffic safety community. Many members of this safety community would welcome an opportunity to help formulate a fair-minded, even-handed educational and public-relations effort to improve the safe driving behavior of both passenger vehicle and large truck drivers. Advocates believes that, given the exceptionally poor track record of the FHWA and the FMCSA in the use of federal funds for the No Zone/STRS efforts, an effort to apply federal money to achieve some measurable reduction of heavy vehicle crash involvement with passenger vehicles needs to be administered by a different federal agency.

Respectfully submitted,  
**ORIGINAL SIGNED**  
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